

I am submitting this comment in response to the NPRM for WT Docket No. 11-40, Improving Communications Services for Native Nations by Promoting Greater Utilization of Spectrum over Tribal Lands.

On the Tule River Indian Reservation located at the foothills of the Sierra Nevada mountain range we have limited to no wireless coverage. We have requested service from the major wireless telecommunications carriers in the area to provide service to the reservation but have had no success. In our outreach to these carriers we have had difficulty in getting a substantive response to our request if we received any response at all. We have a tower site within the boundaries of the Reservation that can be used for mobile wireless service and have provided the three major carriers, Sprint, Verizon and AT&T, with data regarding population, casino headcount, and number of employees on the Reservation. We felt this was an efficient amount of potential calls on a wireless network to entice one of the providers to bring wireless service to Tule River. Like many other tribal lands, we have one winding road that leads into the reservation which is used by all of the tribal members, casino patrons and tribal employees. This one road can be difficult to navigate during the winter months when extreme fog conditions greatly reduce visibility. Not having wireless coverage increases the hazards of travelling to and from and within the Reservation.

The cost of installing, maintaining and administering a wireless network could be prohibitive for a small Reservation or Rancheria that does not already have an established ETC designation or funding to build out facilities to support a wireless network, or the population to regain the investment into a wireless network. For the tribe's that do have the means to provide such services for tribal lands which incumbent wireless carriers have no plans to provide service, the tribal organization that can provide service should have the opportunity to give their members the same technological opportunities that are found in urban America. Tribal Nations have been overlooked during the technological boom which resulted in the current digital divide that is another obstacle for Americas Native people to compete on the same level as the rest of society. Wireless carriers have the obligation to serve the communities for which their spectrum licenses cover. If they cannot or will not, then the Tribe's themselves should be granted the opportunity to do so, using the spectrum that is being held but not being used. Carriers that have no plans to build out on tribal lands should relinquish the spectrum to give the Tribe's the opportunity to provide wireless service on their lands. Carriers that do not provide service to at least 75% of the population of tribal lands within their licensed spectrum should be given the opportunity to engage Tribal Governments to develop a plan to expand services, or relinquish spectrum to allow tribe's the opportunity to provide service. I submit these comments in support of the build or divest proposal outlined in the NPRM.

Lewis Christman

Tule River Tribe of California